



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

OCT 11 2016

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Article Number: 7016 0910 0000 4441 6308

Mr. Thomas Harris III
Harris Companies
2201 Mt. Ephraim Avenue
Camden, New Jersey 08104

RE: Request for Information ("RFI") Pursuant to Section 308 of the Clean Water Act
Compliance Evaluation Inspection Report for CEI conducted on April 5, 2016 at Harris
Camden Terminal
Docket No. CWA-IR-17-001

Dear Mr. Harris:

The United States Environmental Protection Agency ("EPA") is charged with the protection of human health and the environment under the Clean Water Act (CWA or Act), 33 U.S.C. §§ 1251 et seq. Section 308(a) of the CWA, 33 U.S.C. § 1318(a), provides that whenever it is necessary to carry out the objectives of the CWA, including determining whether or not a person/agency is in violation of Section 301 of the CWA, 33 U.S.C. § 1311, the EPA shall require the submission of any information reasonably necessary to make such a determination. Under the authority of Section 308 of the CWA, EPA may require the submission of information necessary to assess the compliance status of any facility and its related appurtenances.

Harris Camden Terminal is hereby required, pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a), to submit to EPA documentation with accompanying photographs of the following no later than deadlines specified:

1. No later than thirty (30) calendar days of receipt of this RFI, submit documentation with accompanying photographs of the measures taken to address the Potential Violation and each of the Areas of Concern specified in the enclosed Inspection Report.
2. No later than thirty (30) calendar days of receipt of this RFI, submit revised detailed Facility maps of the entire drainage system, all drainage pipes, direction of flow and clean water diversions.

All information required to be submitted by this Request for Information shall be sent by certified mail or its equivalent to the following address:

Douglas McKenna, Chief
Water Compliance Branch
Division of Enforcement and Compliance Assistance
290 Broadway, 20th Floor
New York, NY 10007-1866

Internet Address (URL) • <http://www.epa.gov>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 30% Postconsumer)

Any documents to be submitted by Harris Terminal must be sent by certified mail or its equivalent and shall be signed by an authorized representative of the respective entity (see 40 C.F.R. § 122.22), and shall include the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitted false information, including the possibility of fine and imprisonment for knowing violations."

Failure to provide the required information may subject the facility to civil/criminal penalties pursuant to Section 309 of the CWA. Failure to comply with the RFI shall also subject the facility to ineligibility for participation in work associated with Federal contracts, grants or loans.

Enclosed is a copy of the inspection report detailing EPA's findings from the April 5, 2016 inspection at the Harris Camden Terminal Facility.

If you have any questions regarding this Request for Information or the enclosed Inspection Report, please feel free to contact Cyndy Kopitsky of my staff via phone at (212) 637-3832 or via email at kopitsky.cyndy@epa.gov.

Sincerely,



Douglas McKenna, Chief
Water Compliance Branch

Enclosure

cc: Marcedius Jameson, Administrator, Water and Land Use Enforcement, NJDEP
(w/enclosure)



United States Environmental Protection Agency
Washington, D.C. 20460
Water Compliance Inspection Report

Form Approved.
OMB No. 2040-0057

Section A: National Data System Coding (i.e., PCS)

Transaction Code		NPDES										yr/mo/day		Inspection Type		Inspector		Fac Type																							
1	N	2	5	3	N	J	0	1	6	1	7	1	3	11	12	1	6	0	4	0	5	17	18	C	19	R	20	2													
Remarks																																									
21																																									
Inspection Work Days														Facility Self-Monitoring Evaluation Rating														B1		QA		-----Reserved-----									
67		1		69								70		5								71				72				73		74				75				80	

Section B: Facility Data

Name and Location of Facility Inspected (for industrial users discharging to POTW, also include POTW name and NPDES permit number)														Entry Times/Dates				Permit Effective Date			
Harris Camden Terminal Co. 2201 Mt. Ephraim Ave. Camden, New Jersey 08104														09:20 AM				06/01/2007			
														Exit Times/Dates				Permit Expiration Date			
Mr. Garrett Marrazzo, Facility Manager (856) 365-8100 Mr. Thomas Harris III Phone (305) 458-7100 Fax (732) 543-7277														1:00 PM				05/31/2012			
														Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)							
Mr. Thomas Harris III, Owner Harris Camden Terminal Co. 2201 Mt. Ephraim Ave., Camden, NJ 08104 Phone (856) 365-8100 fax (732) 543-7277														SIC Code: 65310401 Lat/Long: 39.916372, -75.101252							
Name, Address of Responsible Official/Title/Phone and Fax Number(s)														Contacted							
														X Yes No							

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> CSO/SSO (Sewer Overflow)
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> Multimedia
<input type="checkbox"/> Effluent/Receiving Water	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water	<input type="checkbox"/> Other:

Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)

See attached report.

Name(s) and Signature(s) of Inspector(s)		Agency/Office/Phone and Fax Numbers		Date	
		EPA/DECA-WCB/(212) 637-3832 FAX:x3953		9/29/16	
Signature of Management Q/A Reviewer		Agency/Office/Phone and Fax Numbers		Date	
Justine Modigliani, P.E., Chief, Compliance Section		EPA/DECA-WCB/(212) 637-4268/FAX:x3953		9/29/16	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2, DECA-WCB
20th Floor, 290 Broadway, New York, NY 10007

COMPLIANCE EVALUATION INSPECTION REPORT

Compliance Evaluation Inspection: Harris Camden Terminal Co.	
Inspection Date: April 5, 2016	Inspection Time: 9:20AM – 1:00PM
EPA Inspector: Cyndy S. Kopitsky, Environmental Scientist, USEPA Region 2, DECA, Water Compliance Branch (212) 637-3832 & Andrew Dinsmore, Stormwater Team Leader USEPA Region 3 (215) 814-2788	
NJDEP Representative: Steven Mathis, 856-614-3655	
On-Site Representative: Garrett Marrazzo, & Thomas Harris III, 305-458-7100	
Site Information: <div style="text-align:center">Harris Companies 2201 Mt. Ephraim Avenue Camden, New Jersey 08104 SPDES No. NJG0161713</div>	

INTRODUCTION

On April 5, 2016, the United States Environmental Protection Agency (“EPA”) conducted a Compliance Evaluation Inspection (“CEI”) at Harris Camden Terminal Co., located at 2201 Mt. Ephraim Avenue, Camden, New Jersey (the “Site” or “Facility”) to determine compliance with the Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (5G2). The facility maintains coverage under the New Jersey State Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity, Permit No. NJG0161713. The effective date of the Permit was 01/18/06. The SIC code in the Request for Authorization (“RFA”) to obtain Permit coverage is 65310401: Rental Agency, real estate. At the time of the inspection, EPA inspectors were told by Mr. Garrett Marazzo, the General Manager that the facilities primary business activity is trucking therefore, the Facility conducts industrial activity under Standard Industrial Classification (“SIC”) Code 4213: Trucking.

According to their website, Harris Camden Terminal Company specializes in hauling overweight and over dimensional loads that require specialized equipment specifically designed to carry unique loads, commonly referred to as “project freight”. Harris hauls throughout the United States as well as into Canada and Mexico however, the majority of the work is performed in the mid-Atlantic region of the United States. The majority of the components of the high rise steel building and concrete structures built in New York, New Jersey, Pennsylvania, Connecticut, Maryland and Virginia are delivered by Harris. Harris is one of the few trucking companies with the experience and equipment to transport large

fabricated steel loads and large construction equipment into New York City. Harris has hauled loads up to 200,000 pounds, wide loads up to 25 feet and long loads up to 210 feet. Harris has also developed an over-the-road group, which specializes in the transportation of long pipe and steel piles that mainly service the gas pipeline and construction industries, as well as heavy specialized service to the U.S. Navy.

The Camden location of Harris Terminal is approximately 60 acres and individually leases to twelve outside industrial facilities. Those industries include and are not limited to:

- **ABC Supply Co., Inc.** (SIC 5031- Lumber, Plywood, Millwork, Wood Panels, Roofing, Siding, and Insulation), according to their website, ABC Supply is the largest wholesale distributor of roofing in the United States and one of the nation's largest distributors of siding, windows, and other select exterior building products, tools and related supplies. Started in 1982, they have become a national organization with more than 600 branches and other facilities in 49 states.
- **WinRoc SPI** (SIC 5033- Roofing, Siding, and Insulation Materials) Specialty Products & Insulation, according to their website, WinRoc SPI specializes in the domestic and global distribution and fabrication of mechanical, industrial, commercial, building, metal building, and HVAC insulation systems; OEM products; passive fire protection systems; architectural/acoustical ceiling, wall and flooring systems and a wide range of specialty products.
- **Amerinox Processing, Inc.** (SIC 3441- Fabricated Structural Metal), according to their website, Amerinox Processing is a full-range stainless steel and aluminum processor. Founding in 2002, Amerinox Processing has become the processor of stainless, aluminum, red metals, titanium and certain coated carbon steels.
- **W&W Steel Erectors** (SIC 3441- Fabricated Structural Metal), according to their website, W&W Steel primarily operates in the steel business/industry within the Wholesale Trade - Durable Goods sector. This organization has been operating for approximately 4 years. W&W Steel Erectors is estimated to generate \$160,000 in annual revenues and employs approximately 2 people at this location.
- **ReCommunity** (SIC 5093- Scrap and Waste Materials), according to their website, ReCommunity is a recycling facility that began in 2011. ReCommunity has become the largest pure-play recycler in North America and is one of twenty-nine facilities in fourteen states with 1,500 employees. ReCommunity is the largest, most-complete resource recovery-operation in the nation. ReCommunity recovers and processes close to two million tons of valuable, reprocessed, reusable materials every year.

At the time of the inspection, EPA noted that one of the tenants at the facility, ReCommunity which is a recycling facility (also known as Fcr, LLC) was in operation on the Harris Camden Terminal site. The following observation is relevant to the ReCommunity portion of the Site:

During the walkthrough EPA observed the ReCommunity operations. It was noted that facility staff were attempting to plow, shovel/relocate waste and scrap material on the majority of the receiving areas, and appear to have directed pollutants into and towards the nearest drain on the property. Additional observations included recycling plant operations that were being conducted outside of any protective cover or containment.

During the walkthrough of Harris Terminal, EPA observed that the dumpsters on the site were uncovered and several were leaking fluids. Several drains were partially blocked and required cleaning. Observations also included an area of the facility lot that had an accumulation of sediment collecting against the building as seen in photo DSCN7033.

During the walkthrough EPA observed machinery and materials stock piled in the SE area of the Harris Terminal facility which was under construction. The collection of water around the elevated drains had a blue/green color. The seals around one of the drains on the construction site were not working properly and allowing water to enter into the drain. Erosion was observed as seen in photos DSCN7053, DSCN7054, and DSCN7023.

At the time of the inspection, the owner of Harris Camden Terminal, Mr. Thomas Harris III, and the responsible official Mr. Garrett Marazzo, the General Manager, were onsite. Mr. Marazzo informed the EPA inspectors that all processes are done indoors. In addition, we were informed that a backflow preventer was installed last year in one of the facilities. Mr. Marazzo informed the inspectors that he was responsible for the operations and maintenance of the entire facility. Mr. Marazzo informed the EPA inspectors that regular maintenance included pulling and cleaning all catch basins twice each year, in the spring and fall. Mr. Marazzo informed the EPA inspectors that there are approximately 30 drains on the site and no drains exist inside in any of the leasing facilities. In addition, in-house safety training is done monthly and there is a condition in the tenant lease describing safety requirements for each facility.

Mr. Harris informed the EPA inspectors that Harris Terminal had coverage under a Multi-Sector General Permit (MSGP) for the entire facility and that ReCommunity had an individual permit. During the closing conference, however, EPA and NJDEP inspectors confirmed that the individual permit was revoked by NJDEP in 2010. Mr. Harris and/or Harris Camden Terminal Co. was not copied on the revocation letter to ReCommunity.

POTENTIAL NONCOMPLIANCE

At the time of the inspection, EPA inspectors were informed by Mr. Harris that the terminal is part of a combined sewer system. At the time of the inspection, EPA inspectors were unable to verify which areas of the terminal was part of a combined sewer system and where the stormwater discharged into Newton Creek. The facility RFA and the SWPPP identifies Newton Creek and the Delaware River as receiving water bodies of the drainage system discharges. As identified in the SWPPP, there is an on-site storm drainage system. The system ultimately discharges under Fairview Street into Newton Creek which ultimately flows to the Delaware River. Stormwater is conveyed through overland flow to the thirty stormwater drains and catch basins throughout the Terminals 60 acre parking lot and facility yard.

- 1) As required by Part C.1.a. of the permit, every facility authorized under the Industrial Stormwater General Permit shall eliminate the exposure of source materials and/or industrial activities to stormwater discharges as required in Part 1.D. At the time of the inspection, ReCommunity was sweeping and plowing recycling operation waste materials, some of which were directly discharged into the storm drains as seen in photos DSCN7041.JPG, DSCN 7042.JPG, therefore in violation of Part C.1.a. of the permit. In addition, there were materials stored in outdoor bins and exposed to stormwater, as well as some processing areas appeared to be emitting materials into the air as seen in photos DSCN7036, DSCN7038, and DSCN7040.
- 2) Pursuant to Part I.12.a. of the permit, this permit does not authorize the discharge of stormwater that is associated with construction activities (see subparagraph 1x of the definition of "stormwater discharge associated with industrial activity" and the definition of "stormwater discharge associated with small construction activity" in N.J.A.C. 7:14A-1.2). In general, this is the discharge of stormwater to surface water from construction activity that disturbs one or more

acre(s). Any facility that operates a construction site with such a discharge shall submit a separate Request for Authorization (RFA) or individual NJPDES Discharge To Surface Water (DSW) permit application for that discharge. An RFA submitted for the Basic Industrial Stormwater General Permit does not qualify as an RFA for such a discharge as seen in photos DSCN7046.JPG, DSCN7047.JPG, DSCN7048.JPG and DSCN7049.JPG.

- 3) As required by Part E.5.a-c. of the permit, monthly maintenance inspections shall be conducted to ensure that all BMPs identified in the SPPP are being properly implemented and/ or maintained, record any problems identified and the corrective action(s) implemented. All monthly inspection records shall be maintained onsite and available for Department inspection. At the time of the inspection there were no records of monthly inspections therefore in violation of Part E.1.a-c of the permit.
- 4) As required by Part E.7.a.-b. of the permit, annually, employees shall be trained to ensure that they understand the requirements of the permit, including the proper implementation and/ or maintenance of all BMPs identified in the facilities SPPP. Employees shall be trained on each aspect of your SPPP that is related to their daily responsibilities. All employee training records shall be maintained onsite and available for Department Inspection. At the time of inspection there were no training records of employee annual trainings therefore in violation of Part E.7.a.-b. of the permit.

AREAS OF CONCERN

- 1) As required in the permit Part E.3. Best Management Practices, include a list of the BMPs that are implemented at the facility in the areas regulated by this permit as identified in the mapping requirements in order to eliminate the exposure of source materials and/ or industrial activity to stormwater discharges. The SWPPP describes and recommends that all containers shall be covered at all times, except when materials are placed in them. During the inspection, EPA noted that all dumpsters were uncovered, there was no indication that covers were available or used during rain events, in one instance the cover was broken, and /or the dumpsters were leaking fluids as seen in DSCN7025.JPG, DSCN7027.JPG, DSCN7030.JPG, and DSCN7031.JPG.
- 2) EPA noted a sediment collection, drywall, and materials outside of the dumpsters and several blocked storm drains at of the facilities as required in D.1.a. of the permit which states that the owner or operator must keep clean all exposed areas that are potential sources of pollutants. At the time of the inspection there was drywall on the ground near the dumpsters, cement type materials outside the dumpster, and materials around a broken drain as seen in photos DSCN7022.JPG, DSCN7023.JPG, and DSCN7028.JPG.

CLOSING

EPA inspectors will be working closely with Harris Camden Terminal and NJDEP to identify the drainage system at this facility and what areas are connected to the combined sewer system. A closing conference was held with Mr. Marrazzo and Mr. Harris III explaining the findings of the inspection. Any additional questions were answered at that time.

ATTACHMENTS

Photographs

Attachment 1 - Photograph Log: Harris Camden Terminal, 2201 Mt. Ephraim Avenue, Camden New Jersey. Unedited photographs taken on April 5, 2016 by Cyndy S. Kopitsky, Physical Scientist, DECA-WCB, USEPA Region 2 with EPA Olympus Stylus camera.

DSCN7020.JPG	Harris Terminal Plot Plan and catch basin
DSCN7021.JPG	Harris Terminal Plot Plan and catch basin
DSCN7022.JPG	Open dumpster, SPI Corp. Drywall spill
DSCN7023.JPG	Drain/partly open to larger objects
DSCN7024.JPG	Open dumpster/Rusty scrap content
DSCN7025.JPG	Open dumpster/Rusty scrap content
DSCN7026.JPG	Scrap metal piles outside Bldg.#21
DSCN7027.JPG	Scrap metal piles outside Bldg.#21
DSCN7028.JPG	Cement materials outside dumpster
DSCN7029.JPG	Oil stains
DSCN7030.JPG	Leaking dumpster
DSCN7031.JPG	Leaking dumpster into blocked drains
DSCN7032.JPG	Drain
DSCN7033.JPG	Sediment collection
DSCN7034.JPG	Sediment collection
DSCN7035.JPG	ReCommunity scrap piles uncontained
DSCN7036.JPG	ReCommunity Operations-emissions
DSCN7037.JPG	ReCommunity scrap
DSCN7038.JPG	ReCommunity operations
DSCN7039.JPG	ReCommunity sediment collection
DSCN7040.JPG	ReCommunity Uncontained recycle scrap
DSCN7041.JPG	Moving debris/waste directly into drains
DSCN7042.JPG	Moving debris/waste directly into drains
DSCN7043.JPG	Moving debris/waste directly into drains
DSCN7044.JPG	Equipment at ReCommunity
DSCN7045.JPG	Equipment at ReCommunity
DSCN7046.JPG	Sediment pile
DSCN7047.JPG	Unpermitted Construction area
DSCN7048.JPG	Unpermitted Construction area
DSCN7049.JPG	Drain at construction area
DSCN7050.JPG	Drain area
DSCN7051.JPG	Drain area
DSCN7052.JPG	Drain area
DSCN7053.JPG	Drain area and erosion
DSCN7054.JPG	Drain area and erosion



DSCN7025



DSCN7027



DSCN7028



DSCN7033



DSCN7035



DSCN7036



DSCN7037



DSCN7038



DSCN7040



DSCN7041



DSCN7042



DSCN7046

4/05/2016

Harris Camden Terminal CEI NJ0083315



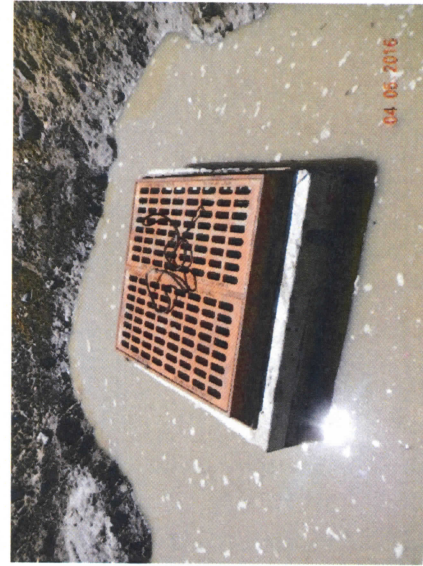
DSCN7047



DSCN7048



DSCN7049



DSCN7053



DSCN7054



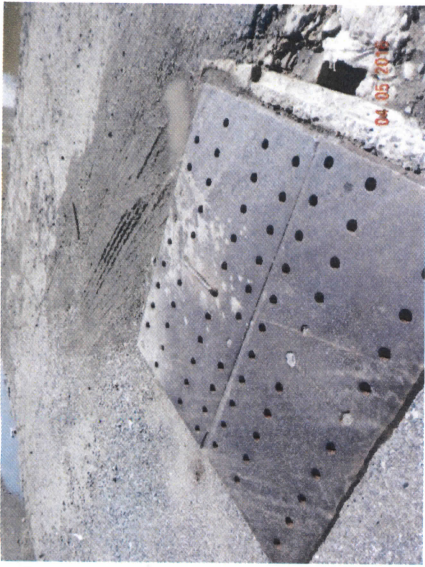
DSCN7022



DSCN7030



DSCN7031



DSCN7023

4/05/2016

Harris Camden Terminal CEI NJ0088315